

Green Delaware's views

“Multi-pollutant” regulation for
power plants

Why does this matter?

- Power Plants in Delaware, along with Delaware City Refinery, are largest “stationary” sources of air pollution
- Serious public health impacts—premature death and disability
- Multiple environmental impacts

Green Delaware generally
supports the technical positions
of “Citizens for Clean Power”

No need to repeat these

Green Delaware's has some
additional concerns

Impacts of power plants are multiple

- Water (DNREC)
- “Solid waste” (DNREC)
- Air (DNREC)
- Health (???)
- Utility regulatory (PSC?)
- Grid “system (PJM?)
- Global warming (???)

But agency programs are
narrowly focused

Have difficulty addressing total
impacts

Often no single concern is sufficient to force change

- “Divide and conquer” prevails
- Operators are able to manipulate the process
- Bad decisions get made
- Issues go unaddressed

This is an “air” proceeding

But total impacts should be considered, especially when looking at alternatives.

Example

- “Open circuit” cooling systems (without cooling towers) have serious impacts on aquatic populations.
- Fish and larvae are killed in their passage through pumps and condensers

Most old Delaware units lack
cooling towers

Increases cooling water volume
ten times

Permitted cooling water volumes

- Edge-Moor 871 million gallons per day (MGD)
(No cooling towers)
- Indian River 411 MGD (largest unit has cooling towers)
- Delaware City Refinery (Valero) 450 MGD +/-
- McKee run—has cooling towers. Not an issue

“Global Warming”

- CO₂ is not a regulated air pollutant
- But it will be in the “near” future
- Endorsement of new coal capacity without considering global warming impacts is shortsighted.

Health

- Evaluations show high benefit/cost ratio for curtailing pollution
- Public health/medical establishments are usually silent
- Plant operators not billed for this “externality” so they are in denial

Mercury

- Presentation by Conectiv offered Hg data inconsistent with TRI reporting
- Mercury contained in ash is also an issue
- E-M coal ash being illegally disposed at “closed” Pigeon Point dump
- Bioaccumulation/concentration in fish is making them inedible
- Another “externality” not billed to operators

Coal ash management

- Situation in re Pigeon Point is criminal
- Irresponsible ash management, regulatory failures, argue against ability of Delaware to burn coal responsibly.

This is a political not a technical problem

- Grandfathering of power plants was a basic Clean Air Act error
- New Source Review and other provisions of CAA has failed to secure updating of power plants
- “Deregulation” of electricity industry has further clouded the issues
- Bush administration especially favorable to special interests

Vital nature of product
(electricity)

Gives great political influence to
power industry

View deferred action with caution

- In the past, Conectiv claimed that remaining unit life did not justify NOx upgrades
- But units have continued to operate
- “Once a fool shame on you ...twice a fool shame on me”

Coal Gasification (IGCC)

- Delaware experience (DCR) not good
- A better way to burn coal
- But not a panacea
- Public reporters (and cabinet secretaries) have gotten the impression that IGCC) is “clean”
- But have they looked at the numbers?

What would be the emissions of
a 650 MW IGCC?

Fuel (coal) switching

- What are the implications of switch to sub-bituminous (PRB) coal?
- Driven by economics but are we on top of the environmental implications?
- Altered mercury emissions?
- Hearing Monday.....

Experience in Delaware suggests
a broad, overall incapacity to
regulate coal combustion
adequately.

This should be rectified before
any serious consideration of
support for new coal units of
whatever technology

State action is required

Explicitly disagree with the views expressed in a previous meeting that Delaware should not go beyond the requirements of Federal programs

What SHOULD Delaware do?

- (Create mechanism to) consider totality of environmental/health impacts
- Cleanup to at least the levels that would be required if the unit were to be built now (both air and water)
- Or hard commitment to shutdown in “short” time frame
- NO NOT promote new coal capacity without carbon sequestration
- We endorse the CCP proposals—no Hg trading, etc.

Energy alternatives

- Conservation and efficiency (“demand side”) can address both energy and capacity needs
- Wind, solar resources exist in and near Delaware. (Hear from Kempton)
- Fuel diversity is important but not addressed in present “deregulated” environment.